

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

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CLERK

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UNITED STATES OF AMERICA

v.

JAIDEN PAIGE,
KWASI ASANTE,
MARK McGINNIS, and
JENNIFER WEBSTER
Defendants.

No. 2:16-CR-19

SUPERSEDING INDICTMENT

The Grand Jury charges:

COUNT ONE

From in or about 2014 to in or about February 1, 2016, in the District of Vermont and elsewhere, defendants JAIDEN PAIGE, KWASI ASANTE, MARK McGINNIS, and JENNIFER WEBSTER knowingly and willfully conspired with others known and unknown to the grand jury to distribute heroin, a Schedule I controlled substance.

Defendant JAIDEN PAIGE's conduct as a member of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved 100 grams or more of a mixture of substance containing a detectable amount of heroin.

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(B)&(C))

COUNT TWO

On or about February 1, 2016, in the District of Vermont, defendant JAIDEN PAIGE knowingly and intentionally possessed with intent to distribute heroin, a schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT THREE

On or about February 1, 2016, in the District of Vermont, defendant KWASI ASANTE knowingly and intentionally possessed with intent to distribute heroin, a schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT FOUR

On or about January 25, 2016, in the District of Vermont, defendant JAIDEN PAIGE knowingly and intentionally distributed heroin, a schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT FIVE

On or about December 7, 2015, in the District of Vermont, defendant KWASI ASANTE knowingly and intentionally distributed heroin, a schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT SIX

On or about April 27, 2015, in the District of Vermont, defendant MARK McGINNIS knowingly and intentionally distributed heroin, a schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

COUNT SEVEN

On or about November 5, 2015, in the District of Vermont, defendant JENNIFER WEBSTER knowingly and intentionally distributed heroin, a schedule I controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

FORFEITURE NOTICE – No. 1

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C)), the defendant, KWASI ASANTE, shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes the following: (a) \$4,635.00 in U.S. Currency seized on February 1, 2016; and (b) \$22,864.24 in U.S. Currency (\$22,739.00 U.S. Currency and \$17,350.00 Jamaican Currency (U.S. Value: \$125.24)) seized on February 1, 2016.

3. If any forfeitable property described above, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

21 U.S.C. § 853

A TRUE BILL

FOREPERSON

Eric S. Miller (MPD/JRP)
ERIC S. MILLER
United States Attorney
Rutland, Vermont
July 6, 2016